

DICKINSON WRIGHT PLLC
 MICHAEL N. FEDER
 Nevada Bar No. 7332
 8363 West Sunset Road, Suite 200
 Las Vegas, Nevada 89113-2210
 Email: mfeder@dickinson-wright.com
 Tel: (702) 550-4400
 Fax: (702) 382-1661

LAW OFFICES OF THOMAS E. FRANCIS, P.C.
 THOMAS E. FRANCIS (*Pro Hac Vice to be submitted*)
 695 Town Center Drive, Suite 700
 Costa Mesa, California 92626
 Email: TFrancis@bohmwildish.com
 Tel: (714) 384-6554
 Fax: (714) 384-6501

Attorneys for Defendant Michael C. Flynn

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

TUTORING CLUB, LLC, a Nevada limited
 liability company,

Plaintiff,

vs.

MICHAEL C. FLYNN, a California citizen; and
 DOES I-X and ROE Corporations I-X,

Defendants.

CASE NO. 2:16-cv-00767-RFB-GWF

**STIPULATION AND ORDER FOR (1)
 EXTENSION OF TIME TO RESPOND TO
 COMPLAINT AND (2) BRIEFING
 SCHEDULE ON MOTION FOR
 PRELIMINARY INJUNCTION**

(FIRST REQUEST)

Tutoring Club, LLC (“Plaintiff”), by and through its counsel, the law firm of Howard & Howard Attorneys PLLC, and Michael C. Flynn (“Flynn”), by and through his counsel, the law firm of Dickinson Wright PLLC and the Law Offices of Thomas E. Francis, P.C., pursuant to Local Rule 6-1 hereby stipulate and agree as follows:

WHEREAS, on or about March 8, 2016, Plaintiff filed a Complaint against Flynn in the Eighth Judicial District Court, Clark County, Nevada bearing Case No. A-16-733114-B (the “Complaint”).

WHEREAS, on or about March 23, 2016, Plaintiff filed a Motion for Preliminary

1 Injunction (“Motion”).

2 **WHEREAS**, on or about April 9, 2016, Flynn filed a Petition for Removal removing the
3 matter to this Court [Dkt. 1].

4 **WHEREAS**, counsel for the parties have conferred and have come to an agreement
5 regarding (1) the deadline for responding to the Complaint and (2) for completing the briefing on
6 the Motion.

7 Now, therefore, based upon the following, the parties, by and through their counsel,
8 hereby stipulate to the following deadlines with respect to the Complaint and the Motion:

9 1. Flynn shall have to and including Friday, April 22, 2016, to file a responsive
10 pleading to the Complaint.

11 2. Flynn shall have to and including Monday, April 18, 2016, to file his opposition
12 to the Motion.

13 3. Plaintiff shall have to and including Wednesday, April 27, 2016, to file its reply in
14 support of the Motion.

15 4. The extensions referenced above are sought in good faith to, among other things,
16 accommodate the schedules of the parties and their counsel.

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5. There have been no previous extensions requested or granted to either party with respect to the Complaint or the Motion.

6. Neither this stipulation nor anything stated herein shall be construed as a waiver or concession or any arguments or objections regarding the propriety of the removal of this action.

IT IS SO STIPULATED.

DATED this 11th day of April 2016.

DICKINSON WRIGHT PLLC

/s/ Michael N. Feder
MICHAEL N. FEDER
Nevada Bar No. 7332
mfeder@dickinsonwright.com
8363 West Sunset Road, Suite 200
Las Vegas, Nevada 89113-2210

LAW OFFICES OF THOMAS E. FRANCIS,
P.C.
THOMAS E. FRANCIS
(Pro Hac Vice to be submitted)
TFrancis@bohmwildish.com
695 Town Center Drive, Suite 700
Costa Mesa, California 92626

Attorneys for Defendant Michael C. Flynn

DATED this 11th day of April 2016.

HOWARD & HOWARD ATTORNEYS
PLLC

/s/ Robert Hernquist
MATTHEW J. KREUTZER
Nevada Bar No. 8834
mjk@h2law.com
ROBERT HERNQUIST
Nevada Bar No. 10616
rwh@h2law.com
3800 Howard Hughes Parkway, Suite 1000
Las Vegas, Nevada 89169

Attorneys for Tutoring Club, LLC

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
United States District Judge

DATED this 11th day of April, 2016.